



40 Broad Street, 7th Floor
New York, NY 10004
Tel. (212) 943-9080
Fax (212) 943-9082

Adrianna R. Grancio
Partner
agrancio@vandallp.com

April 11, 2024

VIA ECF AND ELECTRONIC MAIL

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

**Re: Trustees of the New York City District Council of Carpenters
Pension Fund, et al. v. Tri-State Concrete Polishing LLC, et al., 23
CV 10906 (KPF)**

Dear Judge Failla:

This firm represents the Plaintiffs in the above captioned matter. We write in accordance with Rule 2.C(i) of your Honor's Individual Rules of Practice in Civil Cases to respectfully request a brief extension of time to file the proposed civil case management plan and scheduling order and joint initial conference letter. The current deadline for filing is April 11, 2024. The initial conference is scheduled for Thursday, April 18, 2024 at 10 a.m.

Plaintiffs transmitted drafts of the proposed civil case management plan and scheduling order and joint initial conference letter to counsel for Defendants at 1:30 p.m. and requested Defendants' additions and revisions no later than 4:30 p.m. Plaintiffs telephoned counsel to ascertain the status of review of the joint documents and left a message. As of the filing of this letter, Plaintiffs have not received a response from counsel. Accordingly, Plaintiffs respectfully request a brief extension of time, through Monay, April 15, 2024, to confer with counsel to finalize the documents. The undersigned has worked on multiple cases with Mr. Ziskin and foresees no significant issues with finalizing the draft joint documents within the time proposed. This is Plaintiffs' first request for an extension of time to file the proposed civil case management plan and scheduling order and joint initial conference letter. No other deadlines would be affected if the request is granted. Plaintiffs sincerely apologize to the Court for the late request.

We thank the Court for its time and attention to this matter.



Respectfully submitted,

/s/
Adrianna R. Grancio, Esq.
Attorneys for Plaintiffs

Cc: Richard B. Ziskin, Esq. (via ECF)

Application GRANTED. The parties shall file their joint pre-conference submission on or before **April 15, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 16.

Dated: April 11, 2024
New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE